

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

v.

JEYAKUMAR NADARAJAH,

Defendant.

No. 23-CR-00891-CCC

Hon. Claire C. Cecchi

**NOTICE OF *EX PARTE*, UNDER SEAL  
APPLICATION FOR THE ISSUANCE  
OF A RULE 17(c) SUBPOENA**

**TO:** Scott Armstrong, Trial Attorney (*via ECF*)  
John J. Liolos, Trial Attorney (*via ECF*)  
Jennifer S. Kozar, Assistant U.S. Attorney (*via ECF*)

**PLEASE TAKE NOTICE** that Defendant Jeyakumar Nadarajah will move this Court for an Order issuing a subpoena *duces tecum* pursuant to Federal Rule of Criminal Procedure 17(c). In support of this application, Mr. Nadarajah respectfully relies upon his Memorandum in Support and exhibit, which are filed *in camera* and *ex parte*.<sup>1</sup> A proposed form of order accompanies this Notice.

---

<sup>1</sup> See *United States v. Khaimov*, No. 3:18-cr-00462-MAS, 2023 WL 2744062, at \*1 (D.N.J. Mar. 31, 2023) (permitting *ex parte* and under seal application for pretrial subpoena *duces tecum* under Rule 17(c) where defendant could not make the required showing for issuance of pretrial subpoenas without revealing trial strategy).

Respectfully submitted,

Dated: September 5, 2024

By: /s/ Rahul Agarwal & Zach Intrater

**Friedman Kaplan Seiler Adelman &  
Robbins LLP**

Rahul Agarwal  
7 Times Square  
New York, NY 10036  
(212) 833-1132  
ragarwal@fklaw.com

**Agnifilo Intrater LLP**

Zach Intrater  
445 Park Ave, 7<sup>th</sup> Floor  
New York, NY 10022  
(917) 721-7331  
zach@agilawgroup.com

*Counsel for Defendant  
Jeyakumar “Jack” Nadarajah*